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Attorney for Ricky James Jr. Salas Santos

IN THE UNITED STATES DISTRICT COURT
FOR THE TERRITORY OF GUAM

UNITED STATES OF AMERICA,)	CR 20-00021
)	
Plaintiff,)	MOTION TO CONTINUE
)	SENTENCING HEARING
vs.)	
)	
RICKY JAMES JR. SALAS SANTOS,)	
)	
Defendant.)	
_____)	

Ricky James Jr. Salas Santos, through counsel, respectfully moves the Court for an order continuing his Sentencing Hearing for a period of 2 to 3 weeks.

This motion is made because the parties need to complete additional investigation and interviews relating to 18 U.S.C. § 3553(f) (Safety Valve). The parties are unable to complete these tasks prior to sentencing, which is currently scheduled for Tuesday, November 9, 2021, as AFD Kottke is currently out of the office and AUSA Rosetta San Nicolas is in trial in *United States v. De Leon Guerrero*. The additional time is necessary to insure compliance with the requirements of 18 U.S.C.

§ 3553(f), which is vital to breaking the mandatory minimum sentence and to insure Ricky receives effective assistance of counsel as guaranteed by the Sixth Amendment to the U.S. Constitution.

DATED: Mongmong, Guam, November 5, 2021.

/s/



Briana E. Kottke
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District of Guam

Attorney for Ricky James Jr. Salas Santos